

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

A. Requirements for Preparation

1. Consultation. Consult with the Continuum(s) of Care within the geographic area on: determining how to allocate ESG funds for eligible activities; developing the performance standards for activities funded under ESG; and developing funding, policies and procedures for the operation and administration of the HMIS.

The State of Connecticut is directly responsible for the administration of the CT Balance of State Continuum of Care, and does so through the CT Balance of State Continuum of Care (CT-505) Steering Committee. This committee is made up of representatives of the local sub-continua as well as relevant state agencies.

The Department of Social Services (DSS) and Department of Economic and Community Development (DECD) are active members of the CT Balance of State Continuum of Care (CT-505) Steering Committee. CT Balance of State CoC Steering Committee meets bi-monthly and has done so for more than fifteen years. DSS is also an active member of the Balance of State CoC HMIS Sub Committee, which meets quarterly. The 3 bulleted points are all within realm of active CoC participation.

2. Citizen Participation. Follow existing citizen participation plan for completing a substantial amendment.

The Department of Social Services (DSS) and Department of Economic and Community Development (DECD) followed the citizen participation plan process as contained in the State of Connecticut 2010-2015 Consolidated Plan for Housing and Community Development (ConPlan). [LINK](#)

B. Required Contents of Substantial Amendments

1. SF-424 – To Be Attached
2. Summary of Consultation Process. Describe how the recipient consulted with the Continuum(s) of Care on: determining how to allocate ESG funds for activities; developing the performance standards for activities funded under ESG; and developing funding, policies, and procedures for the operation and administration of the HMIS.

Declaration of FY

The Department of Social Services (DSS) and Department of Economic and Community Development (DECD) are active members of the CT Balance of State Continuum of Care (CT-505) Steering Committee. CT Balance of State CoC Steering Committee meets bi-monthly. During the March 15, 2012 meeting, DSS shared with attendees the proposal for Emergency Solution Grant Allocation #2. This process was conducted to seek input and address any concerns that might identify gaps or deficiencies in the proposed service(s). Based upon existing resources and ESG requirements, member agencies supported the proposed concept, as it would directly assist homeless households. Members were notified of the public hearings to be held for the development of the substantial amendment, and encouraged to attend. At the same time, it

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

was made clear that additional input and support from the BOS Steering Committee would be sought once a draft was available. ESG municipalities' residents will not be able to access these monies, as their municipality received its own ESG #2 Allocation. The one caveat to this statement is as follows: (1) ESG municipalities which are not targeting Rapid Rehousing – Financial Assistance service or (2) ESG municipality has exhausted its funds.

The Balance of State CoC just completed the CoC Check-up process. In fact, DSS completed the ESG/HPRP Grantee(s) self-assessment for the CoC Check-up process. The CoC Action Plan template, located on HUD's Homelessness Resource Exchange states, *"It is recommended that the CoC Action Plan, at a minimum, identify the goals, related strategies and action steps for each goal, responsible party, timeframe, whether technical assistance is needed, and relevance to CoC capacity areas (per Check-up domains/elements/indicators), Federal Strategic Plan goals and HEARTH Act performance measures."* DSS and DECD will continue to be active participants as the Balance of State Continuum of Care develops its Action Plan, which includes developing performance standards for activities funded under ESG. Where possible, the Department will also coordinate with ESG municipalities and thus their Continua of Cares to ensure common ESG requirements and centralized intake, where applicable can be realized.

DSS is an active member of the Balance of State CoC HMIS/PIT Sub Committee. In fact, based upon concerns identified during the 2012 PIT Count and preparation for the submission of the Annual Homeless Assessment Report (AHAR), it became apparent that the Balance of State CoC agencies needed additional HMIS support above and beyond the limited resources currently allocated through the existing CoC HUD grant. Also based upon HEARTH and ESG, the Balance of State CoC HMIS/PIT Sub Committee will charge lead agency with reviewing policies & procedures for the operation and administration of HMIS to ensure compliance and the Department will continue to be an active participant in the process. The Department is also exploring the feasibility of linking data quality compliance to contractual compliance.

3. Summary of Citizen Participation Process. Summarize citizen participation process used, summarize the public comments or views received; and summarize the comments or views not accepted and included the reasons for not accepting those comments.

Summary of Citizen Participation Process

Consistent with the approved Citizen Participation Plan in the CT. ConPlan, DECD held one public hearing to elicit input into the development of the draft Substantial Amendment to the 2011-2012 Action Plan for Housing and Community Development: in Coventry on April 10, 2012. The public was also encouraged to submit written comments. On March 22, 2012, a legal notice announcing the public hearing and requesting public comments was published in two newspapers including one in Spanish. The legal notice and copies of past Action Plans, ConPlans and CAPERs were also available on the DECD website.

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

Consistent with the approved Citizen Participation Plan in the CT. ConPlan , on April 13, 2012, DECD began the 30-day public comment period on the draft Substantial Amendment to the 2011-2012 Action Plan. The public comment period concluded on May 13, 2012. DECD held one additional public hearing: in Hartford on May 1, 2012. On April 12, 2012, a legal notice announcing the public comment period and the public hearing was published in two newspapers including one in Spanish. The legal notice and a copy of the draft Substantial Amendment to the 2011-2012 Action Plan were posted on the DECD website. Copies of past Action Plans, ConPlans and CAPERs were also available on the DECD website.

The municipal chief elected officials of all 169 municipalities in the state received Department Notices informing them of the public hearings and comment periods as well as copies of the legal notices. Copies of the legal notices were forwarded to the Regional Planning Organizations and they were asked to post them to their web sites. DECD also forwarded copies of the legal notices to its Community Partners.

Outline of Activity for Public Hearings/Public Comment

April 10, 2012, Public Hearing: **To be completed.** (See attachment xxx for a copy of the legal notices and transcript)

Written Comments received during the development of the draft Substantial Amendment to the 2011-2012 Action Plan: **To be completed.** (See attachment xxx for copies of comments received)

May 1, 2012, Public Hearing: **To be completed.** (See attachment xxx for a copy of the legal notices and transcript)

Written Comments received during the 30 day Public Comment Period on the draft Substantial Amendment to the 2011-2012 Action Plan: **To be completed.** (See attachment xxx for copies of comments received)

Summary of Public Comments/views received and responses: To be completed

Please note that in this section, received comments have been summarized to reflect the salient issue presented by the commenter. Complete copies of public hearing transcripts and received letters/emails containing comments appear in Attachment xxx of this document.

Summary of comments received during development of the draft Substantial Amendment to the 2011-2012 Action Plan.

From/Date:

Comment/View:

Accepted, Not Accepted/Reason:

Summary of comments received on the draft Substantial Amendment to the 2011-2012 Action Plan.

From/Date:

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

Comment/View:

Accepted, Not Accepted/Reason:

4. Match. Describe: types of cash and/or non-cash resources; specific amounts of resources used as match and proposed uses of match resources.

DSS is required to match 100% of the Second Allocation of ESG FY 2011 which equals \$658,859.00. DSS will utilize state resources to match the Second Allocation of ESG FY 2011 in the amount of \$658,859.00 at a minimum. The proposed use for the match resources are currently operational and dovetail nicely with the proposed usage of ESG Allocation #2. The match resources will be utilized for housing find and stabilization services for literally homeless households. In fact, the department's current housing find / housing stabilization system costs approximately \$1,066,618.00. The department is currently exploring the feasibility of maximizing these resources through the creation of a new program entitled "CT Housing First"

5. Proposed Activities and Overall Budget

a. Proposed Activities.

DSS proposes 2 activities to be funded using the second allocation of funds, which are as follows: (1) Rapid Re-Housing-Rental Assistance and (2) HMIS. No reprogrammed funds from the first allocation will be utilized.

- All recipients must include the following details for each proposed activity:

(1) Corresponding priority needs from recipient's Action Plan;

Rapid Rehousing – Rental Assistance: High Priority Need. Objective 1 under "Homelessness Prevention & Supportive Services" (pg. 73) Goal – *"Enhance suitable living environment, create decent housing, and provide economic opportunities for low- and moderate income persons and address shelter, housing and service needs of the homeless, those threatened with homelessness with an emphasis on preventing homelessness."* Objective 1: "...The occurrence of homelessness is reduced and those experiencing homelessness are quickly transitioning into permanent housing. Additionally homelessness is averted for those individuals and families in danger of becoming homeless.

Homeless Management Information System (HMIS): Objective 1 under "Homelessness Prevention & Supportive Services" (pg. 73) Goal – *"Enhance suitable living environment, create decent housing, and provide economic opportunities for low- and moderate income persons and address shelter, housing and service needs of the homeless, those threatened with homelessness with an emphasis on preventing homelessness."*

(2) Concise description of the activity, including the number and types of persons to be served;

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

Rapid Rehousing – Rental Assistance:

The Department shall utilize Rapid Re-Housing-Rental Assistance to target homeless individuals and families, per definitions at §91.5 and §576.2 (also know as Homeless Category 1 Criteria). Types of financial assistance that shall be available for target population are as follows: security deposit; standard utility deposit; utility payments; moving costs; short-term/medium term rental assistance and rental arrearage. All types of financial assistance will comply with HUD requirements identified in §576.104 and §576.106. The department will leverage existing resources to provide some, but not all of the Housing relocation and stabilization services identified in §576.105. Written standards and procedures will be governed by §576.400. The number of households projected to be served annually is 244, depending upon the financial assistance offered. Based upon limited ESG Allocation #2 resources, targeting will be essential to success. Based upon experience with state funded housing stabilization resources and HPRP, targeting literally homeless households will make a definite impact on returns to shelter. [Point in Time Count 2011](#) report provides a snap shot of homelessness in Count during a day in January is embedded in this document.

Homeless Management Information System (HMIS):

Based upon the Departments continued participation with the Balance of State Continuum of Care, the Department learned that data quality for balance of state agencies has been challenged and the existing level of resources (HUD grant) did not address the gap. The below services will assist the Balance of State CoC and the Department with compliance with HEARTH outcomes. The target population: emergency shelters located in the catchment area. Attached for your ready reference the [Housing Inventory Chart for FY 2011](#) is embedded in this document.

Site visits –

- a. On-site and remote support sessions (Agency requested); and
- b. Based upon risk assessment tool, yearly HMIS policy & procedure reviews; and

AHAR Data Review and Consultation –

- a. Work with agencies throughout the year to assure data quality is within accepted parameters;
- b. Submit initial report to HUD/DSS for review/questions;
- c. Work to resolve issues and answer questions based on initial submission; and
- d. Submit final AHAR for acceptance or rejection.

(3) Corresponding standard objective and outcome categories;

Rapid Rehousing – Rental Assistance:

SL-1.1 Suitable Living Environment with Purpose of New or improved availability/accessibility

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility

Homeless Management Information System (HMIS):

DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility

(4) Start date and completion date* and

Rapid Rehousing – Rental Assistance:

Projected procurement will be released once Substantial Amendment is approved by HUD. The Departments procurement standards require that the process runs, at a minimum of 7 weeks from start to finish; however, based upon the circumstances, the Division of Community Services will request that it be allowed to conduct a procurement within a shorter timeframe based upon the need that exists now that Homelessness Prevention and Rapid Rehousing (HPRP) monies have been exhausted/committed. Proposed start date will be June 15, 2012 – June 30, 2013. To expedite matters, the department will submit to HUD Community, Planning & Development Representative, a synopsis of the proposed procured services.

Homeless Management Information System (HMIS):

Contract for HMIS services will be finalized once HUD approves the Substantial Amendment, as these services will be provided by the Lead HMIS agency for Connecticut, CCEH. Proposed start date will be May 15, 2012. .

**It should be noted, that the department is willing to enter into contract/procurement sooner than the identified date; however, the Department is under the belief that it must first obtain HUD approval prior to incurring costs. If this is not the case, please advise.*

(5) ESG and other funding amounts

Rapid Rehousing – Rental Assistance:

ESG Allocation #2 – (\$43,789.00-admin + services \$540,070) = \$583,859.00

Homeless Management Information System (HMIS):

ESG Allocation #2 – (5,625.00-admin + services \$69,375.00) = \$75,000.00

Other funding – The Department will leverage additional resources for the Housing Relocation / Stabilization Services functions. Projected costs = \$963,618.00. It should be noted that these services will not be exclusive to ESG target population, but will also service households that are homeless beyond Category 1 definition.

- Local governments and territories are required, and States are encouraged, to include the following details for each proposed activity: (6) One or more performance indicators; (7) Projected accomplishments, in accordance with each indicator, to be made within one year; and (8) Projected

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

accomplishments, in accordance with each performance indicator, to be made over the period for which the grant will be used for that activity. – See below chart.

Proposed Activity – Rapid Rehousing – Rental Assistance

Annual Action Plan Planned Project Results			
Outcomes and Objectives	Performance Indicators	Expected Number	Activity Description
SL-1.1 Suitable Living Environment with Purpose of New or improved availability/accessibility	Number of homelessness reoccurrences among DSS assisted families leaving emergency shelters	200	Based upon HMIS data, there will be fewer numbers of reoccurrences among households. Shelter data entry and BSP/HFF or a new program compliance with data entry is essential to success of this measure. Contractual language will be added to address data quality.
	Number of persons housed	150	Persons remain stably housed for at least a 12 month period.
	Number of clients that received appropriate services	200	Housing stabilization services will document through HMIS and client files (leveraged services) appropriate services are addressed.
	Fund leveraged (beyond ESG)	4 programs	Identify at least 4 programs that can support target households: Security Deposit Guarantee Program; BSP/HFF; RAP and mainstream resources (e.g. TFA, FS, LIA Medicaid, SAGA Cash, Dental Clinics, etc.
	Participation with Opening Doors- CT	6 meetings annual	Activity participate with Opening Doors –CT Steering Committee and added quarterly Reaching Home – Crisis Response Workgroup Meetings
DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility	Number of homelessness reoccurrences among DSS assisted families leaving emergency shelters	200	Based upon HMIS data, there will be fewer numbers of reoccurrences among households. Shelter data entry and BSP/HFF or a new program compliance with data entry is essential to success of this measure. Contractual language will be added to address data quality.
	Increases in efficiency or elimination of duplication identified	10% system change	With the alignment of all DSS funded Housing programs under 1 agency (DECD); housing silos that target low- to moderate-income households will reflect streamlined processes.
	Alignment of statewide Housing program systems within 12 months	40% system change	With the alignment of all DSS funded Housing programs under 1 agency (DECD); housing silos that target low- to moderate-income households will be reduced
	Number of New RAP certificates	250	Governor's proposed budget identifies 250 NEW Rap certificates.
	Participation with Opening Doors- CT	6 meetings annually	Actively participate with Opening Doors –CT Steering Committee

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

			and added quarterly Reaching Home – Crisis Response Workgroup Meetings
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Proposed Activity - HMIS

Annual Action Plan Planned Project Results			
Outcomes and Objectives	Performance Indicators	Expected Number	Activity Description
DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility	Percentage change of HMIS data quality scores of at least 5% during 1 st year and 15% within 2 year.	6 meetings annually	Actively participate in Statewide Continuum of Care-HMIS Workgroup
	Alternate means to address homelessness are achieved	6 meetings annually	Attend BOS-Continuum of Care Meeting; review Housing Inventory Charts; PIT Count; network and leverage resources of partners (state agencies, municipalities, non-profit providers and landlords, etc.)

b. Discussion of Funding Priorities

- Explain why the recipient chose to fund the proposed activities at the amounts specified (recommended: if available, use locally-relevant data to support the funding priorities, and explain how the funding priorities will support the national priorities established in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness).

The Department has identified funding priorities based upon 3 key factors:

- Homeless shelter data from [HPRP data](#); [PIT Count 2011](#) and annual FY 2011 Annual Homeless Shelter Demographic Report, which are embedded in this document;
- [Opening Doors](#) – Connecticut – Framework for Preventing and Ending Homelessness, Reaching Home 2.0 Steering Committee Members and agenda from 1st Meeting, which is embedded in this document;

It should be noted that on the [United States Interagency Council on Homelessness' website](#), featured Connecticut's state plan to end homelessness. Connecticut was the 1st state in the country to develop such a plan. "Opening Doors: Federal Strategic Plan to Prevent and End Homelessness" is clear and Connecticut has already embraced the charge whole heartedly. Opening Doors-CT is clear and with HUD's approval of this approach; Connecticut will be able to begin the 1st steps toward re-tooling its crisis response system.

- Number of clients served through DSS funded [CT Beyond Shelter Program](#) – FY 2011.

From the department's experience with provision of services to literally homeless populations, one thing is clear, if households with low to moderate barriers can be assisted during their 1st episode of homelessness and provided with housing stabilization supports, they are not likely to re-enter shelter within their 1st year of housing placement. Prior to implementation of Homelessness Prevention and Rehousing Program (HPRP); financial resources available for homeless households to access were limited to those that were identified as part of the homeless subpopulations (e.g. chronically homeless, seriously mentally ill, chronic substance abuse, etc.) According to the FY 2011 Annual Homeless Shelter Demographic Report (generated from CTHMIS); a total of 10,640 unduplicated persons received services through the CT Emergency Shelter system. Although HPRP

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

resources are committed and no longer available, the need for financial assistance and housing stabilization services remain a need for literally homeless households. ESG allocation #2 – Rapid Re-Housing-Rental Assistance (\$540,070.00) will allow Connecticut to continue its forward process started by the lessons learned from HPRP, CT Beyond Shelter Program and Housing First for Families.

Based up the available of resources, the Department had to make a tough decision about the best method to maximize the resources in order to serve the target population. The message from HUD Secretary Donovan made the decision easy – “*invest highly in rapid rehousing*”, which translates into target resources to get homeless households out of emergency shelters and into permanent housing and provide support services to keep them stably housed. The Department has already started this approach through its existing housing find/housing stabilization services; however the lack of financial assistance sometimes made it difficult to sustain a household over a period of time. Through existing resources, the Department currently provides the following services through various contractors and has chosen to identify these resources as options for ESG Allocation #2:

- a. Prevention – Eviction Foreclosure Prevention Program (EFPP) – state/federal resources
- b. GSDP – Guarantee Security Deposit Program – state/federal resources
- c. Housing Find/ Stability Case Management – state resources
- d. Legal Services – state/federal resources

Although a need might exist based upon homeless data for additional emergency shelter component services; the Department has reached the HUD identified limits for Emergency Solutions Grant allocations.

Finally, \$75,000.00 has been identified for the HMIS component. Based upon existing data quality; additional resources had to be targeted specific to ensuring that Connecticut’s data quality improved drastically and quickly. A number of agencies require on-site or remote sessions and current funding levels don’t support such activity. Also, targeting these funds for HMIS purposes will assist Connecticut in its ability to meet HUD reporting requirements specific to HEARTH. Connecticut wants to identify a minimum data quality score for all programs that enter information into HMIS and without these resources, the requirement for a minimum data quality score will not be attainable. Also, these resources will ensure that Connecticut and the BOS-CoC will be able to comply with HUD expectations specific to annual PIT Counts, as well as required submission to HUD.

- Identify any obstacles to addressing underserved needs in the community.

The obstacles that exist are the same each year. Based upon HMIS, the following are the top 6 reasons for homelessness:

1. Cost of Housing/Expenses exceed income
2. Underemployed/unemployed
3. Substance Abuse
4. Mental Health

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

5. New to Area
6. Family Violence

The Partnership for Strong Communities held an I-Forum on Tuesday, March 21, 2011 entitled “*Opening Doors-Connecticut: Using the Right Tools to End Homelessness*”. One of the presenters, Katherine Gayle had an interesting perspective when discussing barriers/systems that exist in the provision of needed services. Emergency Shelters can’t be all things to all people and must think about partnering/leveraging services through the provision of the right services at the right time. [Ms. Gayle’s presentation](#) is embedded in this document. These barriers currently hinder our ability to address the needs of the target population. Connecticut is just beginning to have these conversations within the [Reaching Home Crisis Response Workgroup](#), of which the member list is also embedded in this document. The Department can not effect change on its own, and it is through dialogue and conversation with providers, Balance of State CoC and members of CT Interagency on Supportive Housing and Homelessness the identified barriers are not insurmountable.

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

c. Detailed Budget

FY 2011 Detailed Budget Table					
First Allocation	\$1,171,305.00	FY 2011 <u>Emergency Shelter Grants/Emergency Solutions Grants</u> <u>Program Allocations</u>			
Second Allocation	\$658,859.00				
Grant Amount	\$1,830,164.00				
Total Administration	\$137,262.30				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$1,145,720.00	\$0.00		\$1,145,720.00
	Rehab/Conversion	\$0.00	\$0.00		\$0.00
	Operations	\$988,665.00	\$0.00		\$988,665.00
	Essential Services	\$157,055.00	\$0.00		\$157,055.00
	Homelessness Prevention	\$0.00	\$0.00		\$0.00
	Administration	\$25,585.00	\$0.00		\$25,585.00
	Emergency Shelter Grants Subtotal	\$1,171,305.00	\$0.00		\$1,171,305.00
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	Renovation**			\$0.00	\$0.00
	Operation**			\$0.00	\$0.00
	Essential Service**			\$0.00	\$0.00
	URA Assistance**			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS		\$0.00	\$69,375.00	\$69,375.00
	Rapid Re-housing		\$0.00	\$540,070.00	\$540,070.00
	Housing Relocation and Stabilization Services			\$0.00	\$0.00
	Tenant-Based Rental Assistance			\$540,070.00	\$540,070.00
	Project-Based Rental Assistance			\$0.00	\$0.00
	Homelessness Prevention		\$0.00	\$0.00	\$0.00
	Housing Relocation and Stabilization Services			\$0.00	\$0.00
	Tenant-Based Rental Assistance			\$0.00	\$0.00
	Project-Based Rental Assistance			\$0.00	\$0.00
	Administration			\$49,414.00	\$49,414.00
	Emergency Solutions Grants Subtotal		\$0.00	\$658,859.00	\$658,859.00
		Total Grant Amount:		\$1,830,164.00	

**Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities (see Section III.B. of this Notice).

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

6. Written Standards for Provision of ESG Assistance

The State of Connecticut has begun having preliminary discussions on implementing a statewide Rapid Re-Housing Financial Assistance Fund with new Emergency Solution Grant funds; which is a hybrid of CT's Homelessness Prevention and Rapid Re-housing Program (HPRP), Beyond Shelter CT Program (BSCT) and Housing First for Families (HFF). Connecticut has identified best practices and lessons learned from the various programs. It should be noted the identified ESG funds are a fraction of Connecticut's HPRP allocation, which is why Connecticut is focusing rapid rehousing financial assistance and leveraging existing state resources for stabilization services. At present, the hybrid program is entitled, "CT Housing First" which will have 2 components RR-financial assistance (ESG funds) and housing find/stabilization services (leveraged resources).

The following program standards have been developed to implement the Statewide Emergency Solution Grant financial assistance Fund; while leveraging existing state resources identified for housing find and housing stabilization programs to assist households with case management and stabilizations services up to a maximum of 12 months from leaving homelessness. During the next few months, Connecticut will continue to review and revise these policies, as additional resources and efforts to identify mainstream resources are realized.

- a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant

Since Connecticut will utilize the existing system that targets literally homeless households for housing stabilization services, this system will not have to be reinvented. The BSCT network of providers currently provide housing stabilization services utilizing standard and shared policies and tools for evaluating program eligibility.

Literally homeless individuals and families may access the program through two entry point:

1. Emergency Shelter staff can refer homeless household to BSCT for service, which can include financial assistance & housing stabilization or housing stabilization services only;
2. Referral from community partners (Head Start, CoC, etc) to BSCT for services.

No matter the entry point, a household (individual or family) contacts the program and if the program has openings, they will receive an initial screening to determine potential eligibility. If deemed potentially eligible for services, a more complete assessment to confirm eligibility is performed for services only or services and financial assistance. Eligibility for financial assistance requires the household to be literally homeless, which means: *"Literally homeless individuals and families currently living in an emergency shelter or place not meant for human habitation."*

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

BSCT, the feeder program will complete the ESG Financial Assistance Application and submit the documentation to the ESG Financial Assistance Administrator to be selected through a competitive procurement process. The BSCT will then forward the completed application for financial assistance with verifying documentation of identification, literal homelessness and income (if applicable) to the ESG financial assistance fund administrator who will provide the financial assistance. The ESG Financial Assistance Administrator will:

1. Review the submitted documents to ensure compliance with HUD expectations and approval as appropriate based upon the availability of funds
2. Approval the financial assistance and update all applicable systems.
3. All financial assistance checks will be cut to a third party and kept in the client's file with the BSCT case manager.
4. Administrator will issue checks to identified parties within 3 – 5 days, assuming all required paperwork and supporting documentation is in place for compliance with HUD requirements.

The initial screening and application process also collects certain basic demographic information on the household (HMIS universal data elements). Households determined initially eligible will receive a full assessment of housing barriers and household resources. Households may be screened out at this point if 1) the household appears to have other resources/housing opportunities that it can access to become re-housed without ESG financial assistance, or 2) the household has very high or multiple barriers to re-housing and another more appropriate placement or referral can be made. Households that are deemed ineligible will continue to receive engagement services through emergency shelter case management services provided by shelter staff.

- b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homelessness assistance providers, and mainstream service and housing providers.

The State of Connecticut currently has systems in place that maximize coordinator of the identified providers. Through BSCT and ESG Financial Assistance Fund coordinator shall occur on various levels:

- BSCT Coordinators meet bi-monthly to discuss, update and amend statewide housing stabilization practices, housing stabilization practices, suggest revisions to existing tools and program policies & procedures, as well as brainstorm on the most efficient ways to

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

stabilize rapidly re-housed households. The meetings are convened by CT Coalition to End Homelessness and the department attends, when requested.

- BSCT Coordinators coordinate with emergency shelters in their catchment area, which they have referral relationships.
 - Attend Continuum of Care sub continua meetings
 - Connecticut is also considering 2 additional approaches:
 1. The 1st Reaching Home Crisis Response Workgroup is scheduled to convene their 1st meeting on April 12, 2012. CCEH's Executive Director is the head of the workgroup and the Department will approach the workgroup members to determine if it would be appropriate for an additional member to be included specific to ESG.
 2. Continue to work with HUD local representative to convene meetings every 6 months with ESG grantees (Connecticut and municipalities).
- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid re-housing financial assistance and housing stabilization services.

Eligible households that are literally homeless at the time of contacting the program, are living in shelter or in a place not meant for human habitation and have been accepted into BSCT program will receive rapid re-housing financial assistance services. A condition for receiving ESG financial assistance will be engagement with BSCT which provides housing stabilization services through state resources. Priority will be given to homeless households located in non-ESG municipalities and ESG-municipalities that are not utilizing their ESG second allocation for rapid re-housing services. Connecticut is currently exploring the possibility of identifying a regional proportionate share based upon # of homeless households served through BSCT, Average Median Income, Fair Market Calculations, etc. to ensure that the limited resources are allocated fairly.

- d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid rehousing assistance.

Financial assistance is based on providing "the least amount of assistance for the least amount of time" while proving enough initial support to be reasonably sure that the housing will stick. Any household moving to new housing may receive 1) deposit only 2) one month's rent and deposit, or 3) a full or partial deposit (if needed) plus a short-term rental subsidy not to exceed 50% of the rent or 50% of the household's income up to 12 months. Exceptions to this minimum rent will be made for households with no or extremely low incomes that have a credible plan to gain employment and/or benefits that are expected to start within six months and can sustain the household after the subsidy period

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

Utility assistance will only be offered to households with utility arrears that prevent them from establishing utilities in a new location. Any other utility need will be referred to other programs, such as the LIHEAP, Assurance 16 case management, Operation Fuel, and matching payment programs offered by utility companies.

- e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjust over time.

The ESG Financial Assistance Fund is intended to offer as little support as needed to re-house households quickly in to permanent housing and reserve resources as much as possible for other households. Financial Assistance will not be offered for more than 12 months per household with income recertification every three months per household.

As described, an engaged household will receive either:

- 1) Deposit only – one-time financial assistance and up to 12 months of housing stabilization services;
- 2) Full or partial deposit and one month rent, intended for household's with a source of income (employment, disability or retirement benefits) sufficient to cover rent after re-housing but with need for initial support to securely transition to housing - one time financial assistance and up to 12 months of housing stabilization services;
- 3) Full or partial deposit and a short-term subsidy to temporarily bridge the income gap, no more than 12 months of financial assistance with income recertification every three months to adjust the rental assistance up or down by 25% per 3 months recertification and up to 12 months of housing stabilization services; and
- 4) Housing find services only, provided through leveraged services,

It should be noted that Connecticut is exploring instituting regional caps on maximum financial assistance based upon the Average Median Income and Fair Market Rents. Maximum Financial Assistance will be for 12 months, with income recertification every 3 months. It is Connecticut's hope that instituting a maximum cap of financial assistance; the thought of reserving resources as much as possible for other households will be obtained.

- f. Standards for determining the type, amount, duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participants may receive assistance.

Connecticut is following practices that it learned from HPRP, provide as little financial assistance services, as necessary to keep the household stably housed, will reserve resource as much as possible for other households. Targeting will be the key to maximizing these resources. The ESG financial assistance is intended to provide rental assistance and rapid re-housing services to literally homeless individuals/families. Financial assistance will be provided up to twelve months, with 3 month recertification to determine if the need still exists; or when the household meets/exceeds the eligibility requirements/financial cap, whichever comes sooner. Connecticut will utilize lessons learned from HPRP to determine financial cap for regions.

Case management, provided through leveraged services, will be provided for households that receive financial assistance. Case Managers are expected to work with households to obtain benefits/entitlements, including income and health coverage or make a referral to another agency that can assist with identified need.

Households in need of housing search assistance will receive help, identifying units and making applications to landlords. Households will receive housing and support services that focus on ensuring that the household has the support needed to make progress on the housing stabilization plan and that the landlord is satisfied that the household is receiving support for housing related needs.

7. Describe Process for Making Sub-awards

The State of Connecticut intends to utilize 2 processes for the making of sub-awards: competitive procurement and sole-source activities.

- a. The State of Connecticut will competitively procure a portion of ESG Allocation #2 funds for Rapid Rehousing – Rental Assistance identified funding to one entity for the administration of the financial assistance. The successful candidate will demonstrate their ability to administer financial assistance as well as provide other services associated with rental assistance: HMIS utilization, inspections, rent reasonableness verification, fair market rent verification, 3 month verifications, etc. The Department will incorporate best practices learned from its administration of the statewide HPRP regional programs. Connecticut will leverage existing resources to provide rapid rehousing – housing relocation and stabilization services; as these programs target homeless households without financial resources to keep the households stably

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

housed. It is the department's expectation to have the competitive procurement issued no later than May 31, 2012.

- b. The State of Connecticut intends to sole-source a portion of ESG Allocation #2 funds to Connecticut Coalition to End Homelessness, Inc. ("CCEH") for HMIS component. CCEH is Connecticut's lead HMIS agency and thus already has systems in place to maximum these funds. ESG Allocation #2 funds targeted for HMIS will assist the Balance of State Continuum of Care with caring out their activities associated with HEARTH expectations, PIT Count, CT Opening Door Campaign; which are not presently covered by existing resources.

Currently, Connecticut utilizes state resources totaling \$170,000.00 for the support of CT's HMIS (Service Point 4.0) annually. CT has also committed in SFY 2013 to assist with the purchase of a new HMIS system with one-time funding, as the current system is not responsive to the needs of Connecticut homeless service providers, state agencies and CT Continua of Care. No HUD monies will be utilized to purchase the new HMIS system; however, it should be noted that the Statewide Continuum of Care-HMIS/PIT subcommittee conducted a procurement process to identify the new system. Once again, Connecticut is demonstrating its participation and responsiveness with the Continuum of Care process.

8. Homeless Participation Requirement

Per the guidance issued by HUD in Notice of the FY 2011 Substantial Amendment Process and Other Related Information for Recipients of Emergency Solution Grants Program Funds and Rules and Regulations §576.405, (a) states, *"Unless the recipient is a State, the recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG)."* As a state recipient, this section is not applicable for State of Connecticut.

Although Connecticut is not required to participate in the "Homeless Participation Requirement", Connecticut believes that empowerment of consumers is important. According to Emergency Shelter State Regulation Section 17-590-6 (a), *"Each shelter shall create a shelter grievance procedure. The shelter shall consult with residents of the shelter when creation the grievance procedures."* And Section 17-590-7 (a)(1) states, *"Any decision of a grievance review may be appealed to: (1) a panel of three people, consisting of a shelter resident or former resident, a shelter staff person or a member of the Board of Directors and another person not employed by the shelter or receiving shelter services. The panel chairperson shall be the person not employed by the shelter or receiving shelter services; ..."*

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

9. Performance Standards

The recipient must describe the performance standards for evaluating ESG activities, which must be developed in consultation with the Continuum(s) of Care.

The State of Connecticut is an active member of the Balance of State Continuum of Care Steering Committee. The State of Connecticut intends to consult with the BOS CoC Steering Committee and applicable subcommittees to begin to develop performance standards for evaluating ESG activities, the HEARTH outcomes will be an integral part of the process. The Continuum of Care has 2 subcommittees that might be integral to the development of performance standards and they are as follows: Mainstream Resources/Discharge Planning Subcommittee and Scoring/Evaluation Subcommittee. It is Connecticut's expectation that providers will meet or exceed the identified performance standards, which are currently under development.

Connecticut will also utilize the Reaching Home's crisis response system workgroup to assist with these efforts, as members represent service providers, state agencies, philanthropy, etc. in an effort to identify measures for success and applicable reporting outcomes in an effort to address the 5 key goals:

- a.** Target appropriately to ensure that monies are maximized, for example those that most need the assistance. CT is just starting to examine the implications of coordinated/centralized intake process and the applicable impact up the current system. Connecticut has data that identifies the population utilizing our shelter system, however, now we must look at methods to coordinate service to better target the resources. The first hurdle that Connecticut will have to address will be targeting criteria for homeless households that should be rapidly re-housed. Between the assistance of the CoC and the workgroup, Connecticut will be provided with enough information to create the best possible system from the existing information available.
- b.** Reducing the number of persons entering shelter: Approximately 9.18% of those anticipated to be served with ESG funded services will be homeless upon entry. Through the review of HMIS data, CT and its subrecipients will be able to track where persons enter the program from and compare this information with Point In Time Data collected annually. Connecticut plans on contractually requiring emergency shelters and transitional programs to participation in annual PIT Counts. Based upon current demand, the immediate reduction in shelter beds will not be felt; however, it is anticipated that the number of available beds will be occupied by those previously considered unsheltered because of overcapacity.
- c.** Shortening the time persons spend homeless: A primary goal for Connecticut is the reduction in the length of stay in homelessness. Through rapid re-housing services, it is expected to occur within 60 days of homelessness. Connecticut will also have to spend

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

time educating the provider network concerning the feasibility of “shortening the length of stay” practices in homeless shelters. Shortening the stay in homelessness will hopefully become the new mindset and not viewed as impossible. In order to be successful, CT will have to start to develop goals and benchmarks toward achieving that goal and contractually require subrecipients to make efforts to reach such goals and benchmarks.

- d.** Providing the right service at the right time: CT currently contractually requires emergency shelter providers to report on the follow outcome: *“Client attains alternative housing and/or accesses social and/or treatment services. Alternative housing includes, but is not limited to, transitional housing, residential treatment programs, supportive and permanent housing. Social services include but are not limited to domestic violence abuse counseling, family counseling, educational and employment and financial counseling, child care, security deposit and rental assistance programs. Treatment services include, but are not limited to, residential and outpatient mental health and substance abuse treatment and medical treatment.”* However, we have learned from Homelessness Prevention and Rapid Re-Housing (HPRP) that the greatest barrier to housing for most clients is lack of income. Based upon this fact, CT will have to require additional performance standards to address the income barrier and at a minimum, look at income as 2 measures: (1) percentage of households leaving with employment income and (2) percentage of households entering with income and leave the program with an income. Finally, we examine data specific to households that leave homelessness, per HMIS, return to homelessness within 12 months.
- e.** HMIS data quality score – Connecticut is exploring the possibility of contractually requiring a data quality score as a performance measure. Compliance rate at a minimum will range between 90% - 95% during the 1st year of performance measures. Connecticut has learned from submission of reports specific to HPRP, PIT and APRs that incomplete or inaccurate data hinders the state’s ability to document homelessness in Connecticut.

As Connecticut is in the planning stages of performance measures to ensure HEARTH compliance, the ultimate tool to ensure compliance is contractual requirements. Connecticut is in the process of transitioning its Housing programs operated by the Department of Social Services to the Department of Economic and Community Development, effective July 1, 2013. This alignment will assist in Connecticut’s efforts to ensure compliance and implementation of Performance Standards.

DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

C. Written standards required for recipients who are eligible and decide to use part of the second allocation of FY 2011 funds for emergency shelter and street outreach activities.

The State of Connecticut does not intend to use any part of the second allocation of FY 2011 for emergency shelter and street outreach activities, so this section is not applicable. The budget detail will reflect this fact.

D. Requirements for recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the “at risk of homelessness” definition

- If recipient plans to serve persons “at risk of homelessness,” based on the risk factor “otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness:” describe specific characteristics associated with instability and increased risk of homelessness.

The State of Connecticut does not intend to serve persons who are “at risk of homelessness” with any part of the second allocation of FY 2011, so this section is not applicable. The budget detail will reflect this fact.

E. Requirements for Optional Changes to the FY 2011 Annual Action Plan

1. Centralized or Coordinated Assessment System

- If the recipient’s jurisdiction, or a portion of the recipient’s jurisdiction, currently has a centralized or coordinated assessment system and the recipient or subrecipients utilize the centralized or coordinated assessment system, the recipient should describe the assessment system in the substantial amendment.

The State of Connecticut does not currently have a centralized or coordinated assessment system.

Through CT Opening Doors and the efforts of the State of Connecticut, a centralized or coordinated assessment system is an intended output, but such output will not be realized by the time this substantial amendment must be submitted. This section is not applicable to Connecticut.

2. Monitoring

- If existing monitoring procedures are not sufficient to allow recipients to monitor compliance with the new requirements, HUD encourages recipients to update their monitoring standards and procedures in the process of submitting this substantial amendment. This should address appropriate levels of staffing.

The State of Connecticut’s monitoring procedures are current at this time and no further modification will be required. Connecticut’s current monitoring procedures are fluid enough to embrace ESG requirements identified under the second allocation of FY2011.